



October 7, 2024

VIA HAND DELIVERY

Judge Sean Lane
Southern District of New York - Bankruptcy Court
300 Quarropas Street
White Plains, New York 10601

FILED
U.S. BANKRUPTCY COURT
2024 OCT -7 A 11:00
S.D. OF N.Y.

RE: Case Index Nos 23-22095, 23-11805 Adv. Proc. Nos 23-7009, 24-7009, 24-7010, Debtor Letter Requesting Voluntary Recusal Of Judge Sean Lane From This Bankruptcy Case

Judge Sean Lane:

Right from the beginning of these above referenced cases, filed on or about February 2023, your Honor has been openly and overtly hostile, verbally abusive, humiliating and mocking undersigned Debtor on the public record, openly threatening and intimidating undersigned Debtor, and all in all done everything other than offer bankruptcy protection and comfort.

Instead, based on the public record of this case, you have consistently given comfort, quarter, and aid to undersigned Debtor's attackers, enemies, gang stalkers, harassers, criminals, and open and unapologetic wilful violators of the 2 automatic bankruptcy stays on the above referenced bankruptcy case numbers, even when solid documentary evidence of said violations, preceded first by Debtor requests to the seemingly lax and lazy trustees have been given first, to stop and protect Debtor, who generally did nothing.

These wilful violators have run the gamut from illegal alien street criminals who have in writing threatened Debtor and his staff with violence and murder (and who are being pursued by federal, state, and local law enforcement) all the way to judges, both federal and state, who have also demonstrated the same callous disregard for Debtor's automatic bankruptcy stay and protections even after having

repeatedly been given written notice and hard copies of Debtor's bankruptcy filings.

But through them all, your Honor has coddled, cajoled, and protected them, while threatening undersigned Debtor, ridiculing, mocking, and humiliating undersigned Debtor on the record, while summarily and without any cogent or competent legal reasoning thereon, just small snippets and insults peppered with more threats of sanctions and ad hominem verbal abuse.

And according to the very public record, both in this case and others such as in the Rudolph Giuliani bankruptcy case, your Honor Judge Sean Lane has demonstrated a similar level (although not as egregious and shameless) of disrespect, abuse, threats, and public humiliation directed against other Republicans or Conservatives (worse in undersigned Debtor's case when that person is a racial or ethnic minority), with you being an openly former President Barack Obama appointed federal judge, the latter of whom is the makeshift but undeclared leader of this country's George Soros-funded, extremist left wing, socialist if not communist political sects of the Democrat party, those same members and people who have used the past 4 years since President Joseph Biden and United States Department of Justice Attorney General Merrick Garland have openly tortured, marginalized, punished, prosecuted, persecuted, abused, threatened, intimidated, harassed, humiliated, mocked, and attacked with a government ferociousness at a level more than at any time in United States history.

You have artificially extended this case into a torture session approaching 2 years, both literally and figuratively, proximately and directly causing, if not exacerbating, undersigned Debtor's and his wife and young childrens' health problems, brain tumor, cardiovascular disease (your Honor knows that Debtor had a heart attack in 2019), peri-orbital cellulitis often causing blindness, clinical anxiety, hair loss, and other serious health conditions and problems either brought on *de novo*, or made infinitely worse, by your abusive and frightening behavior on the bench.

You have simultaneously, using legal and equitable means, hamstrung and tied up undersigned Debtor, callously dismissing undersigned Debtor as a "vexatious litigator," a phrase borrowed by many of your Honor's judicial and government lawyers colleagues in order to suspend or remove my ability to defend myself, not allowing or forbidding him from legally and equitably defending himself from the constant, outrageous, vicious, vengeful, cruel, relentless, and rapid-fire pummeling that undersigned Debtor has received, from no less than 20 of Debtor's known (and unknown) enemies and nemeses, while one by one shooting down or outright summarily dismissing or mooting undersigned Debtor's defensive motions, pleadings, letters

and in-court rebuttals, all the while peppering Debtor with insults, verbal abuse, threats, mockery and humiliation.

While Debtor has desperately sought the outside intervention of federal, state, local regulatory and law enforcement agencies to both curb and counter your abusive, contumacious, arbitrary, and capricious judicial misconduct, most of those appeals have gone nowhere due to the aforementioned political extreme leftist, communist, socialist, and racist climate fostered, nurtured, and worsened by current President Joseph Biden and his administration, as well as DOJ U.S. Attorney General Merrick Garland and his jack-booted thugs in the justice department, targeting and stamping out any vestiges of conservatives, Republicans, christians, or anyone else not full throatedly supporting your (and their) extremist left wing beliefs, value systems, and politics.

To that end, it is way past time for your Honor, Judge Sean Lane, to voluntarily recuse yourself from these above referenced bankruptcy cases, and allow someone with a more moderate and even temperament to take over and conclude these cases to completion, since you are clearly not fit to do so.

Respectfully submitted,



Rahul D. Manchanda, Esq.
270 Victory Boulevard
New Rochelle, NY 10804